

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

JAMES ST. LOUIS,	)	
	)	
Plaintiff,	)	
	)	
v.	)	C. A. No. 06-236-SLR
	)	
LT. CHERYL MORRIS, et al,	)	JURY TRIAL REQUESTED
	)	
Defendants.	)	

**DEFENDANTS' INITIAL DISCLOSURES**  
**PURSUANT TO FED. R. CIV. P. 26(a)**

Pursuant to Fed. R. Civ. P. 26(a), Defendants Sheryl Morris, Christopher Klein, Michael Knight, Harry Legates, Eric Lehman, Andre Johnson, and Mary Boring (“Defendants”) hereby provide Plaintiff with the following information:

(a) Individuals likely to have knowledge of discoverable information that may be used to support Defendants’ defenses:

- 1) Food Service Supervisor Sheryl Morris, Delaware Correctional Center (“DCC”), 1181 Paddock Road, Smyrna, DE 19974.
- 2) Food Service Director Christopher Klein, DCC.
- 3) Correctional Food Service Administrator Michael Knight, Delaware Department of Correction (“DOC”), 245 McKee Road, Dover, DE 19904.
- 4) Food Service Supervisor Harry Legates, DOC.
- 5) Food Service Supervisor Eric Lehman, DCC.
- 6) Andre Johnson, c/o undersigned counsel.

7) Food Service Specialist Mary Boring, Sussex Work Release Center, Route 6, Box 700, Georgetown, DE 19947.

(b) Documents that may be used to support Defendants' defenses:

See documents produced in response to Plaintiff's Request for Discovery Materials, filed contemporaneously herewith.

(c) Experts and their opinions:

Defendants have not yet retained any experts, but reserve the right to do so, and will supplement this response as required by Rule 26(a).

(d) Insurance agreements in force:

Not applicable. Defendants further disclose that no such insurance exists.

(e) Basis for any damages claimed:

Not applicable.

Defendants reserve the right to supplement these disclosures.

STATE OF DELAWARE  
DEPARTMENT OF JUSTICE

/s/ Eileen Kelly  
Eileen Kelly, I.D. #2884  
Deputy Attorney General  
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Attorney for Defendants

Date: August 9, 2007

**CERTIFICATE OF SERVICE**

I hereby certify that on August 9, 2007, I electronically filed *Defendants' Initial Disclosures* with the Clerk of Court using CM/ECF. I hereby certify that on August 8, 2007, I have mailed by United States Postal Service, the document to the following non-registered party: James St. Louis.

/s/ Eileen Kelly  
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